

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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**DEBRA SPERO, as Natural Mother of  
V.S., an infant,**

Plaintiffs,

v.

**VESTAL CENTRAL SCHOOL DISTRICT  
BOARD OF EDUCATION, VESTAL CENTRAL  
SCHOOL DISTRICT, JEFFREY AHEARN,  
Superintendent of Schools, ALBERT A. PENNA,  
Interim Principal of Vestal High School,  
DEBORAH CADDICK and CLIFFORD KASSON,  
in their Individual and Official Capacities,**

Defendants,

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**AFFIDAVIT OF KATHARINE DYER**

Civil Action No.: 3:17-cv-00007  
(GTS/DEP)

STATE OF NEW YORK     )  
                                      ) ss.:  
COUNTY OF BROOME     )

KATHARINE DYER, being duly sworn, deposes and says:


1. I am a teacher with the Vestal Central School District (hereinafter "District"). I make this affidavit of my own personal knowledge and am fully competent to testify as to all matters herein.

2. I do not use racial slurs. I never used a racial slur in my classroom, contrary to the claim by Plaintiff Vincent Spero in this litigation.

3. Plaintiff Vincent Spero never stated directly to me that I had used any racial slur.

4. On December 1, 2016, during my fourth period mathematics class, Plaintiff Vincent Spero said "Drexel," the name of my street, and "Maxwell Lawrence," the first and middle names of my husband. When he said these things, he was glaring at me.

5. I was concerned that Plaintiff was obviously attempting to intimidate me. I was fearful for myself and my two young children.

  
Katharine Dyer

Sworn to before me this 28  
day of May, 2019.

  
Notary public

DONNA J HARRINGTON  
NOTARY PUBLIC, STATE OF NEW YORK  
NO. 01HA6018733  
QUALIFIED IN BROOME COUNTY  
COMMISSION EXPIRES JANUARY 19, 20 23